

Welcome - Carol Smith

Introductions by Stakeholder members

Adrienne Holt who served as the representing for consultants will not be able to serve on the committee. The committee should look for a new member to represent the consultants.

The SCDHEC Board update: Most of the members have been replaced.

The drinking water fee increase was not given a favorable report by the House subcommittee. More information will be provided in the next stakeholder meeting.

Sandra Flemming: Office of Laboratory Certification will survive the cuts with assistance until next year.

Recent sanitary overflows issues from waste water treatment plants: SCDHEC lab and outside labs that were doing the analyses did a side by side sampling and analyzed samples by membrane filter method. There were large differences between the results noted. Most laboratories analyzing membrane filter method are not understanding the importance of these samples and not providing the proper training for counting and reporting fecal coliforms. DHEC is looking to change water quality indicator from fecal coliform to E.coli which will allow other methodology since there are many problems with the membrane filter method.

An ATP for Fecal Coliform using Colilert 18 was recently approved by EPA Region 4. Bennie Cockerel discussed the procedures for the Colilert 18 analyses. The Office of Environmental Laboratory Certification highly recommends switching from membrane filter to Colilert 18 for analysis of Fecal Coliform.

Questions about the ATP can be forwarded to Bennie Cockerel or you can visit the Lab Cert website under "What's New". www.dhec.sc.gov/labcert

Questions and Comments on minutes from last meeting: No comments

Subcommittee Reports and Discussion

Definitions Subcommittee - Thomasena Simmons

Met on March 3rd

Discussed the addition of quality control terms at the request of the Data Reporting Subcommittee. In this section the members and Carol Smith concluded that certain terms would not be included in the definitions section unless they appear in the regulation. However MDL and RL will be included.

The subcommittee defined all terms except the ones that require definitions from the subcommittees.

Due to file corruption the terms and definitions that were documented during this meeting were lost and could not be recovered. The subcommittee will work to recreate the terms and definitions. Once it is complete a copy will be emailed to the committee members for comments and/or suggestions.

We have not received any more words from the subcommittees at this time. Please send any terms discussed in the subcommittee meetings to the Definitions Subcommittee.

Personnel Qualifications and Training Records - Allan Clum

Last met on March 4th. The subcommittee defined Laboratory Director and included educational and experience requirements. The subcommittee is currently working on the outline of this section. It will include job qualifications and training record requirements.

A template for training will also be included in this section. Continued training should be in the section. Adrienne Holt is no longer involved and we need another member. Would like to include other types of labs for variety.

Quality Systems/QA/QC - Bob Pullano

Subcommittee is reviewing the TNI quality systems document. Motion made to look at other states regulations.

Wisconsin DNR 149 met the group's objectives. Group plans to take the Wisconsin DNR document and modify it to meet the needs of SC Lab Certification.

Goal is to meet the needs for all types of laboratory and to cover all of the SOP requirements

Field Parameter Laboratories - Heather Beard

Looking at different states regulations to see how other states are addressing field parameters.

Meeting discussions:

Are field calibrations necessary instead of just calibration checks. When is it appropriate to perform field checks and field calibration?

Environmental conditions for field and mobile types of labs. Is it ok to calibrate your instrument in a pickup truck? Where would lab cert inspect the lab if calibration done in a truck?

If a field lab is associated with another certification is it necessary for the field lab to have separate certification. The subcommittee would like input from the committee members.

Data Reporting - Cheryl Johnson

Met twice since in March. Created a comprehensive list of what needs to be in a report.

Meeting discussions:

Data qualifiers and the ramifications of these qualifiers. Ideas by regulatory agencies vs. laboratories.

Is there a standardized list of acceptable of qualifiers?

Are there qualified data that should not be reported at all such as sample out of holding time? What are the show stoppers that will cause the laboratories to reject samples? Regulation should not say that you should or should not analyze data. What are data qualifiers that are ok to use in reporting?

Who is responsible for re-sampling?

Stakeholder's responses:

Not all samples are to be analyzed by a certified lab.

Data reported to the department must be certified. That is what the regulation is for. This reg is for data that is to be reported to the agency.

Qualifiers should be documented on the report that indicates the sample is not for regulatory compliance so that the client will know not to report to the agency.

Bennie Cockerel stated that the lawyer of a particular lab stated that the laboratory cannot state in the report that the sample does not meet compliance specifications because they don't know the end user. It must state that it does not meet method requirements.

Consultants should be involved in the regulation development since they are compiling reports submitted to the Department.

Sandra Flemming: Regulation should not be so restrictive that it is a financial burden on people. Communication is important between the client and laboratory.

Lab Cert: Certificate of analysis must include the original lab reports.

Standardize what is to be included in the reports to the end user so all laboratories provide the same amount of information (at no extra cost). Not providing all the information to the end user may become a financial burden.

Who actually looks at the data, qualifiers, and supporting information? How can the permittee ensure that all the information required to be submitted to the Agency by permittee is going to remain with the data?

The data submitted is being filed. Problem is that agency has a limited amount of time for data review. The data reported must be quality data and reportable because the labs should have a quality system in place.

What do the stakeholders think are show stoppers?

1. Sample out of holding time

The lab's responsibility to tell the client that it is not reportable and the client must make the decision if they still want the information from the lab.

Quality data is attached to the laboratories reputation. The laboratory has responsibility to inform the client when a compliance sample is not meeting the method qualifications.

GEL leaves it up to the client to report the data but they provide information about the parameter by including qualifiers and sample specifications. The client must review the data provided to determine if it is meeting requirements for compliance.

It's the law for the samples to meet the requirements specified in the method. If labs are not meeting the method requirements they are not meeting the law.

Who decides when the data can not be reported? The lab, the client, or the regulatory agency?

It is the laboratories responsibility to let the client know that it did not meet the method specification? It is the client's responsibility how to use the data?

There should be a place on the chain of custody that the sample collector fills out to state if the sample is for compliance or noncompliance.

The clients do not want the laboratory to reject samples.

The regulation should not put responsibility/fault on the lab for un-reportable data. Be careful on who's responsible for reporting data. The lab has the responsibility to document the sample specification and qualifiers on the client reports.

The agency needs documentation to ensure that the correct method is used and the parameter requirements are met. Client must make the lab aware that the sample is for compliance.

Show stoppers: whether to analyze the samples.
Is sample out of holding time a qualifier?

Show stoppers will financially hurt the commercial labs. If they turn the client away the client will find someone who will analyze the samples.

The subcommittee discussed in the meeting every lab must have a sample acceptance policy. There will be documentation that the client was made aware if they decided to have the samples if it doesn't meet the policy. Would this cause a burden?

What are show stoppers?

1. Samples out of hold
2. Anything that's not in 40CFR

The lab has a legal responsibility to let the client know if samples are not meeting method criteria.

Florida standardizes their qualifiers. Find universal system on how the samples are qualified.

Sample Collection – Chain-of-Custody by Jason Collins

Meeting discussions:

Criteria for sample acceptance.

What a lab must do when they reject a sample.

Discussion whether to including 6°C or just make a general temperature requirement.

What needs to be in the regulation concerning the laboratory's sample acceptance policy.

Jason: Permittee is responsible for data reporting and not the lab. The regulation should be structure on the assumption that people will go by the law.

Section 4A: What has to be on the chain-of-custody?

Committee's discussion on the highlighted topics concerning the chain-of-custody:

Should the number of containers be in the chain-of-custody?

The number of containers should be confirmed by sample collector and lab. This will eliminate any confusion after the fact if it is documented on chain-of-custody.

This is not required for all types of labs and could be burdensome and unnecessary for certain labs.

This requirement must be universal for all labs.

What if the chain-of-custody and sample records are the same in some cases? Labs using this type of form will be financially burdened.

Roger Brewer/Chris Cole: Disagree that number of containers be recorded on chain-of-custody. This will be a burden.

Chain-of-custody is a legal document and must include specific sample collection information, preservation of all containers, and verification that all documented samples were received.

This must be an overall requirement for all types of laboratories. DHEC lab will need to have an internal discussion on how to update their forms to meet this requirement once it is in the regulation.

The purpose of chain-of-custody is to define what's collected and in the cooler. The lab must inventory what's inside and verify what is documented on the chain-of-custody is actually in the cooler.

Types of containers must also be documented on the chain-of-custody.

Roger Brewer: Container types would also be burdensome for some labs.

Program area must be documented on the chain-of-custody. The lab must have communication with client on the type of sample that requires analysis. This is important to determine how to analyze the sample.

Thermal preservation must be documented on chain-of-custody.

Language must be included in the regulation to state that there must be a downward trend in temperature of the sample from collection to receipt into the lab.

People who drop off samples will not know to take the temperature of the samples. It would not matter for those people because the sample collectors are not certified for temperature.

DHEC district offices always send temperature blanks.

A properly cooled environment should be acceptable.

Don't put in the regulation that we should measure the downward temperature trend. This will confuse people.

Whatever is stated in the regulation must be well defined to set the standard for legal purposes.

Quality System subcommittee discussed received on ice, samples not frozen, no blue ice.

Storage of Samples:

Language came from Wisconsin regulation.

The 6 °C notation should be removed from this section or replaced with the "specified preservation temperature" or "samples requiring thermal preservation must meet the qualification of state and federal regulation. "

6°C will be removed.

Section 5 D & E will remain in the regulation.

Note for Secondary Lab:

Language came from Wisconsin.

Committee agreed on this portion to be included in the regulation.

Sample Acceptance Policy:

Carol Smith: Think about this policy and whether or not samples should be rejected and today's discussion. Email me your comments on this topic.

You must think about legal repercussions of not documenting this information.

Steve Burdick: The holding time of Chem Waste samples?

Next Meeting is **Thursday May 5, 2011 at 10am.**

Subcommittees should meet before next meeting.

Quality Systems and Assurance Subcommittee is in charge of snacks.

The website will be updated for the other subcommittee members.

Ask members of your subcommittee to recruit members.

Stakeholder Committee Members	Laboratory	Attendance
Bob Pullano	GEL	Present
Cheryl Sommers	Commonwealth Labs	Present
Jeff Czarnecki	Greenville Water System	Present
Heather Beard	Richland Co. Utility	Present
Alan Clum	Mount Pleasant Waterworks	Present
Marlene Gillespie	Giant Resource Recovery	Present
Thomasena Simmons	BP Cooper River Plant	Present
Larry McCord	Santee Cooper	Present
Jay Kates	Water Systems Inc.	Absent
Jason Collins	Keowee Key Utility	Present
Cheryl Johnson	Pace Analytical	Present
Adrianne Holt	Consultant: CE McKenzie & Associates	Absent: Requested to be removed from Stakeholder Committee due to time constraints.

SC DHEC Employees Present	Area	Email Address
Carol Smith	Lab Cert	smithcf@dhec.sc.gov
Michael Mattocks	EQC Labs - ARES	mattocm@dhec.sc.gov
Chris Doll	BLWM - UST	dollcs@dhec.sc.gov
Leigh Plummer	DHEC Region 4	plummelw@dhec.sc.gov
Susan Butts	Lab Cert	buttsse@dhec.sc.gov
Mahtab Gowan	Lab Cert	gowanmn@dhec.sc.gov
Sandra Flemming	DHEC EQC Labs	flemmisa@dhec.sc.gov

Regulation 61-81 Stakeholder Committee Meeting Minutes**March 31, 2011**

Crystal Rippy	Bureau of Water	rippycd@dhec.sc.gov
Judy Graham	DHEC EQC Labs QA	grahamjl@dhec.sc.gov
Mary Ann Fuller	Bureau of Water	fullerma@dhec.sc.gov
Bennie Cockerel	Lab Cert	cockerbl@dhec.sc.gov
Jamie Berry	Lab Cert	berryjc@dhec.sc.gov
Constance Gibson	EQC Labs – ARES Lab Cert	gibsoncs@dhec.sc.gov
Nydia Burdick	DHEC EQC Lab QA	burdicknf@dhec.sc.gov
Alfred Baquiran	Lab Cert	baquiraj@dhec.sc.gov
Cynde Devlin	BLWM	devlincl@dhec.sc.gov
Chris Cole	EQC Lab - ARES	colecp@dhec.sc.gov
Roger Brewer	EQC Lab - ARES	brewerre@dhec.sc.gov